

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	Case No. 04-CR-10298-DPW
)	
v.)	
)	
MARKO BOSKIC)	
_____)	

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

Defendant requests that the following questions be included in this Court's voir dire questions to prospective jurors. These questions are in addition to follow-up questions that are necessitated by a juror's response(s) to the questionnaire.

1. Now that I have given you more details about the nature of this case, do you think you may have read or heard anything about this defendant or this case?

2. Does the fact that Mr. Boskic is sitting here charged with a crime make you think he must have done something wrong?

3. You are going to hear evidence about hundreds of Muslim men and boys being executed. You will hear about bodies being buried in mass graves, dug up with machines causing dismemberment, and then reburied. What affect, if any, will the gruesome nature of this evidence have on your ability to fairly decide this case?

4. If a law enforcement officer, such as an FBI agent or

immigration agent, testified, and then Mr. Boskic testified differently about the same interview, would you be inclined to give more credit or weight to the testimony of the law enforcement officer than to the testimony of Mr. Boskic simply because he is a law enforcement officer?

5. You will hear evidence that Mr. Boskic wrote a statement in which he admitted that he had been involved in the mass executions at Srebrenica but that his participation was on threat of death and that a firearm had been pressed to his forehead. Mr. Boskic is not on trial for war crimes or murder. He is on trial for allegedly making false statements about his military service. What effect will the government's evidence about Mr. Boskic's role in Srebenica have on your ability to fairly evaluate evidence about Mr. Boskic's alleged false statements?

6. Do you have any opinion about the persons who participated in the executions at Srebrenica upon threat of death?

7. Have you ever been in a situation where you feared being hurt or killed as a result of violence? If so, please tell us about the incident.

8. Are you aware of any information, bias or prejudice you may have which may affect your ability to consider the evidence in this case fairly and impartially?

Respectfully submitted,

/s/ Patricia Garin
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